

**UNITED STATES DISTRICT COURT
DISTRICT OF MARYLAND**

ERAMOSI OYATHELEMI,

Plaintiff,

v.

L J ROSS ASSOCIATES, INC.,

Defendant.

Case No.

Hon.

Removed from the District Court of
Maryland for Anne Arundel County of
Glen Burnie, Maryland
Case No. D-07-CV-20-016055

Eramosi Oyathelemi
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Pro Per Plaintiff

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Attorneys for Defendant L J Ross

NOTICE OF REMOVAL

PLEASE TAKE NOTICE THAT, pursuant to 28 U.S.C. § 1331, § 1441(c), and § 1446, Defendant L J Ross Associates, Inc. (“Defendant”), through undersigned counsel, hereby files its Notice of Removal to the United States District Court, District of Maryland, based on federal question jurisdiction, stating as follows:

1. On October 26, 2020, Plaintiff Eramosi Oyathelemi (“Plaintiff”) commenced a lawsuit in the District Court for the County of Anne Arundel, Maryland, entitled *Eramosi Oyathelemi*, Case No. D-07-CV-20-016055 (the “State Court Action”).
2. The State Court Action involves Plaintiff’s factual allegations that Defendant is a “debt collection agency,” improperly “certified to the credit bureaus” Plaintiff’s debt, and improperly “reported an unverifiable debt to the credit bureaus.”
3. Plaintiff thus asserts claims that sound in law under The Fair Credit Reporting

Act, 15 U.S.C. § 1681 *et seq.*

4. This action may be removed to this Court pursuant to 28 U.S.C. § 1441 because this is a civil action involving federal questions. 28 U.S.C. § 1331.

5. Venue is proper in this jurisdictional district pursuant to 28 U.S.C. § 1441 because this district is where the State Court Action was pending at the time of Removal.

6. Defendant has complied with 28 U.S.C. § 1446(a) by attaching, as **Exhibit A**, a copy of all process, pleadings, and orders served upon Defendant in this action.

7. Defendant's registered agent received the State Court Action Complaint on November 11, 2020.

8. Defendant files this Notice of Removal within thirty (30) days after receipt of the Complaint in accordance with 28 U.S.C. § 1446(b).

9. Defendant will expeditiously file a Notice of Filing of Notice of Removal with the District Court for the County of Anne Arundel, Maryland. A true and correct draft of the Notice of Filing for Removal is attached hereto as **Exhibit B**.

ACCORDINGLY, Defendant respectfully moves this Court for an order enjoining any further action in the State Court Action and removing the State Court Action now pending in the Circuit Court for the County of Milwaukee to this Court.

Respectfully Submitted,

/s/ David M. Thomas
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Dated: November 24, 2020

CERTIFICATE OF SERVICE

I hereby certify that on **November 24, 2020**, I electronically filed the above document and this Certificate of Service with the Clerk of the Court using the ECF system.

I also certify that I served the above document and this Certificate of Service via U.S. Mail to:

Eramosi Oyathelemi
P.O. Box 3170
Crofton, MD 21114
(601) 291-2920
Pro Per Plaintiff

I DECLARE THAT THE STATEMENTS ABOVE ARE TRUE TO THE BEST OF MY INFORMATION, KNOWLEDGE AND BELIEF.

By: Danielle Juras